

# **EXHIBIT 4**

**2025-04-30 IBM Letter re VirtaMove's April 28th Correspondence**

**Interrogatory No. 9:**

We maintain that VirtaMove's Disclosure of Asserted Claims and Infringement Contentions remain deficient per our earlier correspondences. We further maintain that IBM has done a reasonable investigation into documents and information responsive to this request, including documents relating to IBM products specifically identified in VirtaMove's Infringement Contentions, and we have produced numerous responsive documents. IBM has been continuing its diligent search into information in this regard, and to the extent additional relevant and responsive documents can be located after a reasonable search, they will be promptly produced. Notwithstanding the above, IBM will supplement its response to this interrogatory shortly, which will include the documents identified in its April 18, 2025 correspondence.

IBM's investigation into information responsive to this interrogatory is ongoing, and IBM reserves all rights to amend, modify, and/or supplement its response.

**2025-04-29 IBM's Response to VirtaMove's Notice of 30(b)(6) Deposition to IBM**

8. IBM objects to the definition of "Accused Products" as overly broad and unduly burdensome to the extent it purports to require IBM to provide testimony concerning products that are not accused in Plaintiff's operative Infringement Contentions. In IBM's responses and objections, "Accused Products" shall mean IBM Cloud Kubernetes Service.

**2025-05-09 Email from Jefferson Cummings to Nate Ngerebara**

**From:** [Jefferson Cummings](#)  
**To:** [Ngerebara, Nate](#)  
**Cc:** [#IBM-VirtaMove KE Team](#); [Friedman, Todd M.](#); [Virtamove team](#)  
**Subject:** Re: VirtaMove v. IBM - Source Code Review  
**Date:** Friday, May 9, 2025 9:09:17 AM

We would also like to provide notice that Mr. Chiang would like to continue his review on May 19-23, and Mr. Koskinen would like to continue May 27-29. Please confirm this is acceptable.